



March 23, 2021

Dear SAICM Secretariat,

Thank you for drafting the Recommendations for continuing SAICM and a preparatory process for the postponed IP4 and ICCM5 meetings during these challenging times.

We agree with the approach identified in the document SAICM/ICCM.5/Bureau.TC.7/2, including the recommendation to “Extend the SAICM instrument in its current form due to *force majeure* circumstances until ICCM5 can formally convene (including the bureau, secretariat and any existing subsidiary institutional arrangements)”.

We also agree with the suggested scenario that “In mid-2021, the ICCM administrative decisions on the continuation of SAICM, its work programme and budget are taken using the silence procedure.”

SAICM/ICCM.5/Bureau.TC.7/2 document also includes a recommendation for “a biennial work programme (including ongoing and/or new SAICM work, any provisions for extending the work of the IP)”. We believe that such a work programme should make a clear reference to the existing SAICM Global Plan of Actions, including agreed actions on SAICM Emerging Policy Issues and Issues of Concern. These actions have already been agreed upon by all SAICM stakeholders and thus, they do not need to be discussed again.

However, if the biennial work programme includes “new SAICM work” as suggested in the draft recommendations, it might require discussions by SAICM stakeholders and will delay risk reduction activities further.

The stakeholders should use the time between now and the face-to-face meetings to address gaps identified in the Global Chemical Outlook and the UNEP assessment report of Issues of Concern towards achieving the 2020 goal and contribute to the 2030 Agenda. Thus, we would like to emphasize that the suggested biennial work programme should clearly underline steps towards achieving meaningful prevention and reduction of toxic chemicals use, emissions, waste generation, and contamination of people and the environment. The evaluation of the implementation of the biennial programme should be conducted prior to ICCM5 to identify the remaining gaps.

We therefore request the SAICM President, SAICM Bureau, and SAICM Secretariat to draft a decision on extending the current SAICM mandate, including its Global Plan of Actions until a new instrument is adopted. This decision should be taken in a silent procedure as suggested in the draft Recommendations. The implementation of this decision should go in parallel with the decision to continue the ICCM4 IP-mandate until ICCM5 can formally convene.

We are looking forward to participating in the consultations to develop a biennial work programme as suggested in the draft Recommendations.

Sincerely yours,
Olga Speranskaya
Alexandra Caterbow
Health and Environment Justice Support (HEJSupport)

on behalf of

Swedish Society for Nature Conservation (SSNS)
Andreas Prevodnik, andreas.prevodnik@naturskyddsforeningen.se

Groundwork/Friends of the Earth South Africa
Rico Eurpidou, rico@groundwork.org.za

Canadian Environmental Law Association
Fe de Leon, deleonf@cela.ca

European Environmental Bureau
Jeremy Wates, Secretary General, eeb@eeb.org

BUND/Friends of the Earth, Germany
Manuel Fernández, Manuel.Fernandez@bund.net

Forum Umwelt und Entwicklung
Wolfgang Obenland, obenland@forumue.de

Women's Healthy Environments Network
Cassie Barker, cassie@womenshealthyenvironments.ca

RightOnCanada

Kathleen Ruff, kruff@starlynx.ca

Pesticide Action Network International (PAN International)

Susan Haffmans, susan.haffmans@pan-germany.org

Armenian Women for Health and Healthy Environment (AWHHE)

Gohar Khojayan, gohar.khojayan@gmail.com

Eco-Accord, Russia

Olga Ponizova, ecoaccord@gmail.com

Women Engage for a Common Future (WECF)

Johanna Hausmann, johanna.hausmann@wecf-consultant.org

TOXISPHERA, Brazil

Zuleica Nycz, zuleica.nycz@gmail.com

Greenwomen, Kazakhstan

Lidia Astanina, lidia.astanina@gmail.com

Chemical Safety Agency, Ukraine

Denis Pavlovsky, dpavlovskyi88@gmail.com